REMARKS

In the application claims 14-22 remain pending. Claims 1-13 have been canceled without prejudice and may be pursued in a continuation application. Claims 14 and 20 have been amended to further clarify what is regarded as the invention. Support for the amendments may be found in the specification and figures as originally filed and, as such, no new matter has been added.

Pending claims 14-22 presently stand rejected. The reconsideration of the rejection of the claims is, however, respectfully requested.

Pending claims 14-22 presently stand rejected under 35 U.S.C. § 103 as being obvious by Viswanath (U.S. Published Patent Application No. 2003/0074271) as modified by Matsakis (U.S. Published Patent Application No. 2005/0273772) as further modified by Peat ("Introducing XML/EDI…the e-business framework").

In response to rejection of the claims, it is respectfully submitted that, to maintain a rejection under 35 U.S.C. § 103, the references being relied upon must disclose all of the claimed elements considering each and every word, i.e., the claim must be considered "as a whole." Since none of Viswanath, Matsakis, nor Peat, whether considered alone or in combination, disclose, teach, or suggest the invention claimed "as a whole," it is respectfully submitted that the claims must be deemed allowable.

More particularly, none of Viswanath, Matsakis, nor Peat, disclose, teach, or suggest the desirability of a system and method that provides for using a graphical user interface tool to create an IML file that includes a first set of IML tags defined by a document type definition that are used to select data for inclusion in an invoice *and* a second set of IML tags defined by the document type definition that are used to specify *both a page style for the invoice and how to display the selected data within the invoice*.

Rather than disclose, teach, or suggest these claimed elements, Viswanath discloses

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nothing more than a system which generates OBI XML formatted purchase orders for sending to suppliers by buyers which includes a XML translation of the entire in-bound XML formatted requisition request which translation is performed using a "two-step XML file translation process." Specifically, in Viswanath it is not a XML file created using a graphical user interface tool that defines *both* the style and data to include in a document but is, in direct contrast, an inbound requisition received at a "translation engine" that defines at least the data that is to be included in the to-be-created, outbound purchase order. Thus, it is evident that nothing from Viswanath discloses, teaches, or suggests the claimed graphical user interface tool which allows for the creation of an IML formatted invoice that includes *all* of the elements set forth within the claims.

Similarly, Matsakis discloses nothing more than a system that functions to perform conversions between different XML formats to achieve server-to-server transfer of invoices, purchase orders and other business data streamed in the e-business context. Thus, like Viswanath, in Matsakis it is not a XML file created using a graphical user interface tool that defines *both* the style and data to include in a document but is, in direct contrast, an inbound data stream received at a "translation engine" that defines at least the data that is to be included in the to-be-created, outbound data stream. Accordingly, like Viswanath, it is evident that nothing from Matksakis discloses, teaches, or suggest the claimed graphical user interface tool which allows for the creation of an IML formatted invoice that includes *all* of the elements set forth within the claims.

Finally, while Peat may disclose that one might define their own markup language with XML, like both Viswanath and Matksakis, nothing from Peat discloses, teaches, or suggest the claimed graphical user interface tool which allows for the creation of an IML formatted invoice that includes *all* of the elements set forth within the claims.

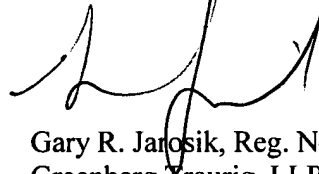In sum, it is respectfully submitted that the combination of Viswanath, Matksakis, and

Peat cannot be said to disclose the entirety of the invention now claimed as is required of a *prima facie* case of obviousness. For at least this reason it is respectfully submitted that the rejection of the claims must be withdrawn.

CONCLUSION

It is respectfully submitted that the application is in good and proper form for allowance. Such action of the part of the Examiner is respectfully requested. Should it be determined, however, that a telephone conference would expedite the prosecution of the subject application, the Examiner is respectfully requested to contact the attorney undersigned.

While it is not believed that any fees are due, the Commissioner is authorized to charge any fee deficiency to deposit account 50-2428 in the name of Greenberg Traurig.

Respectfully Submitted;

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By: Gary R. Jarosik, Reg. No. 35,906
       Greenberg Traurig, LLP
       77 West Wacker Drive, Suite 2500
       Chicago, Illinois 60601
       (312) 456-8449